

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

GOLDEN BETHUNE-HILL,
et al.,

Plaintiffs,

v.

Civil Action No. 3:14cv852

VIRGINIA STATE BOARD
OF ELECTIONS, et al.,

Defendants.

OATH OF CONFIDENTIALITY

I, _____, declare that the following is true:

(1) I am employed by the Virginia Division of Legislative Services ("DLS").

(2) DLS has authorized me to provide technical assistance and support to the Special Master in this action, Dr. Bernard Grofman, with regard to his work for the Court in preparing and recommending a proposed remedial redistricting plan for eleven Virginia House of Delegates districts.

(3) I agree to assist Dr. Grofman to the best of my abilities. I promise to keep strictly confidential any and all information, whether oral, electronic, or paper, related to my

work with Dr. Grofman, including, but not limited to (a) data, emails, spreadsheets, shapefiles, block equivalency files, and other notes or working papers of any kind; and (b) my communications with Dr. Grofman, his assistants, or Court personnel of any kind (collectively "Confidential Information"), and not to discuss with others (including, without limitation, other DLS or state government employees not directly assisting Dr. Grofman) any Confidential Information, including, without limitation, the substance or details of my assistance to Dr. Grofman in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Date: _____